

DECLARATION OF ERIK KREUTZER

4. As of June 8, 2020, Z Capital Credit Partners held Serta First Lien Term Loans with a face value of [REDACTED]

CONFIDENTIAL

5. Z Capital Credit Partners was not invited to participate in the liability management transaction that was completed in June 2020.

6. On June 8, 2020, after the transaction at issue had been announced to the market, [REDACTED], then a Managing Director at Z Capital Credit Partners, contacted

[REDACTED] to [REDACTED]

[REDACTED], because [REDACTED]

[REDACTED] informed [REDACTED] that

the transaction was [REDACTED] further informed [REDACTED]

that the [REDACTED],

[REDACTED]

I attach as Exhibit 1 a copy of [REDACTED] email correspondence that has been produced in this matter (SSB_ADVERSARY00139403).

7. Following this exchange, on June 20, 2020, [REDACTED], an Associate at Z Capital Credit Partners, contacted [REDACTED], one of the preferred lenders who

did participate in the transaction and is a plaintiff in this adversary proceeding. [REDACTED]

noted that Z Capital Credit Partners had “[REDACTED]

[REDACTED]

[REDACTED] related that although Z Capital Credit Partners was “[REDACTED]

[REDACTED]

[REDACTED]” and reiterated [REDACTED] request that Z Capital Credit Partners “[REDACTED]

[REDACTED]” [REDACTED] expressed Z Capital

Credit Partners’ desire “[REDACTED],” while also

acknowledging “[REDACTED].” [REDACTED] responded

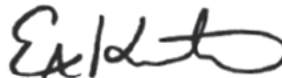
that [REDACTED]

[REDACTED]” I attach as Exhibit

2 a copy of [REDACTED] email correspondence that has been produced in this matter
(SSB_ADVERSARY00157024).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 16, 2023
New York, New York



Erik Kreutzer

KREUTZER EXHIBIT 1 – FILED UNDER SEAL

KREUTZER EXHIBIT 2 – FILED UNDER SEAL